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October 24, 2016

By Ecf

Honorable Colleen McMahon
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Jaber
13 Cr. 485 (CM)

Hon. Judge McMahon:

A conference in this matter is scheduled for October 26, 2016. However, the parties are engaged in plea negotiations which have not yet concluded. Hence, we request that the status conference be rescheduled for a date in late November at which time the parties may have concluded their plea discussions.

To that end, we request that the time between October 26, 2016, and the next court date set by the Court, be excluded under the Speedy Trial Act, pursuant to Title 18, United States Code, section 3161 (h) (7) (A). Excluding time will best serve the ends of justice and outweigh the best interests of the public and the defendant in a speedy trial, as it will allow the parties to continue plea discussions. Thank you.

Respectfully submitted,

/S/

Sabrina P. Shroff
Assistant Federal Defender

cc: George Turner, AUSA
Faouzi Jaber, Reg. No. 75840-054